

EXHIBIT 8

DECLARATION OF PLAINTIFF FELIPE DE JESUS AVILA-SOTO

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

)
FELIPE DE JESUS AVILA-SOTO, et al.)
Plaintiffs,) Case No. 6:24-cv-01392
)
v.) JUDGE ROBERT R. SUMMERHAYS
)
) MAGISTRATE JUDGE CAROL B.
SOUTH CENTRAL SUGAR CANE)
GROWERS' ASSOCIATION, INC., et al.)
Defendants.)
)

DECLARATION OF FELIPE DE JESUS AVILA-SOTO

1. My name is Felipe de Jesus Avila-Soto. I am one of the Plaintiffs in this case.
2. I live in Mexico and worked for the Defendants with an H-2A temporary work visa as a truck driver during the 2022 sugarcane harvest season.
3. My job as a truck driver was to operate a tractor-trailer truck to haul sugarcane from fields to the Sterling Sugars mill. I did not have any other employment responsibilities with the Defendants other than to work as a truck driver.
4. There were many of us from Mexico with H-2A visas who did the same job as me—driving trucks to haul sugarcane to the mill. There were so many of us that the mill had a dispatcher to send all the truck drivers communications about where to go to pick up the sugarcane.
5. I worked more than 40 hours during most of the weeks that I worked for the Defendants as a truck driver. I never received any overtime pay when I worked more than 40 hours in a week. Attached to this declaration are copies of some of the paycheck stubs that I

received when I worked for the Defendants that show I did not receive overtime pay when I worked more than 40 hours in a week.

6. I know that my co-workers who came from Mexico with H-2A visas and who also worked as truck drivers also did not receive overtime pay. I know this because we lived together and would sometimes talk about how we were paid.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on _____, 2025

Felipe de Jesus Avila-Soto



SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5175

Employee Name: FELIPE D AVILA SOTO

CHECK NUMBER

SSN #:

Check #: 1272

Pay period : 10/05/22 to : 10/18/22		Earnings		Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars			
Gross	2262.79	Reg	181.75	2262.79	FWT	71.50	MEALS -196.00
Other	0.00	OT1	0.00		OASDI	0.00	STORES -100.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	53.37	
		Sick	0.00		SDI	0.00	
Subtotal	2262.79	Hol	0.00		SUI	0.00	
		Comm					
Taxes	-124.87	Misc					
Deducts	-296.00	Other					
Net Pay	1841.92	Gross Pay		2262.79	Total Tax	124.87	

Year-to-Date: Gross 3134.29 FWT 71.50 MED 0.00 Federal Tax ID: 88-[REDACTED]
12.450 OASDI 0.00 SWT 59.53

Pay Rate:

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT



CHECK NUMBER

SSN #: 1564
Check #: 1564

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

Employee ID: 5175

Employee Name: FELIPE D AVILA SOTO

Deductions
& Other Pays

Pay period : 10/19/22 to : 11/01/22		Earnings		Taxes		Dollars		MEALS	-196.00
Type	Hours	Dollars	Type	Hours	Dollars	Type	Dollars		
Gross	2511.79	Reg	201.75	2511.79	FWT		101.38		
Other	0.00	OT1	0.00		OASDI		0.00		
Tips	0.00	OT2	0.00		MED		0.00		
Cash Tips	0.00	Vac	0.00		SWT		62.09		
		Sick	0.00		SDI		0.00		
		Hol	0.00		SUI		0.00		
Subtotal	2511.79	Comm							
Taxes	-163.47	Misc							
Deducts	-196.00	Other							
Net Pay	2152.32	Gross Pay		2511.79	Total Tax		163.47		

Year-to-Date: Gross 5646.08 FWT 172.88 MED 0.00 Federal Tax ID: 88-[REDACTED]
12.450 OASDI 0.00 SWT 121.62

Pay Rate:

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

South Central Sugar Co.

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5175

Employee Name: FELIPE D AVILA SOTO

SSN #:
Check #: 1743

Pay period : 11/02/22 to : 11/15/22		Earnings		Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars			
Gross	2303.25	Reg	185.00	2303.25	FWT	76.35	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	-196.00
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	54.79	
		Sick	0.00		SDI	0.00	
Subtotal	2303.25	Hol	0.00		SUI	0.00	
		Comm					
Taxes	-131.14	Misc					
Deducts	-196.00	Other					
Net Pay	1976.11	Gross Pay	2303.25	Total Tax	131.14		

Year-to-Date: Gross 7949.33 FWT 249.23 MED 0.00 Federal Tax ID: 88-[REDACTED]
Pay Rate: 12.450 OASDI 0.00 SWT 176.41

PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

SOUTH CENTRAL SUGAR CANE GROWERS' ASSOCIATION, INC.

CHECK NUMBER

Employee ID: 5175

Employee Name: FELIPE D AVILA SOTO

SSN #:
Check #: 1845

Pay period : 11/16/22 to : 11/29/22		Earnings		Taxes		Deductions & Other Pays	
Type	Hours	Dollars	Type	Dollars			
Gross	1596.71	Reg	128.25	1596.71	FWT	2.36	MEALS
Other	0.00	OT1	0.00		OASDI	0.00	
Tips	0.00	OT2	0.00		MED	0.00	
Cash Tips	0.00	Vac	0.00		SWT	30.06	
		Sick	0.00		SDI	0.00	
		Hol	0.00		SUI	0.00	
		Comm					
Taxes	-32.42	Misc					
Deducts	-140.00	Other					
Net Pay	1424.29	Gross Pay		1596.71	Total Tax	32.42	

Year-to-Date: Gross 9546.04 FWT 251.59 MED 0.00 Federal Tax ID: 88-[REDACTED]
12.450 OASDI 0.00 SWT 206.47

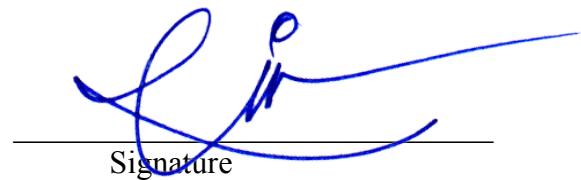
PLEASE DETACH BEFORE DEPOSITING FOR PAYMENT

Pay Rate:

Declaration of Translation

I, Carlos Radillo, declare that I am a certified Federal and State Court translator and I am fluent in both the English and Spanish languages. I have reviewed the attached Spanish Declarations of Felipe de Jesus Suarez Palafox and Felipe de Jesus Avila Soto and the English translations and I certify that the translations are true and correct.

I declare under penalty of perjury that the foregoing is true and correct, and that I executed this declaration on November 14, 2025.



A handwritten signature in blue ink, appearing to read "Carlos Radillo", is written over a horizontal line. Below the line, the word "Signature" is printed in a small, sans-serif font.

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF LOUISIANA

FELIPE DE JESUS AVILA-SOTO, et al.)	
)	Case No. 6:24-cv-01392
Plaintiffs,)	JUDGE ROBERT R. SUMMERHAYS
)	MAGISTRATE JUDGE CAROL B.
v.)	WHITEHURST
)	
SOUTH CENTRAL SUGAR CANE)	
GROWERS' ASSOCIATION, INC., et al.)	
)	
Defendants.)	
)	

DECLARACIÓN DE FELIPE DE JESUS AVILA-SOTO

1. Mi nombre es Felipe de Jesus Avila-Soto. Soy uno de los demandantes en este caso.
2. Vivo en México y trabajé para los demandados con una visa de trabajo temporal H-2A como camionero durante la temporada de cosecha de caña de azúcar de 2022.
3. Mi trabajo como camionero consistía en operar un camión con remolque para transportar caña de azúcar desde los campos hasta el molino Sterling Sugars. No tenía ninguna otra responsabilidad laboral con los demandados aparte de trabajar como conductor de camión.
4. Había muchos de nosotros de México con visas H-2A que hacíamos el mismo trabajo que yo: conducir camiones para transportar caña de azúcar al molino. Éramos tantos que el ingenio tenía un despachador para enviar comunicaciones a todos los camioneros sobre dónde debían ir a recoger la caña de azúcar.
5. Trabajé más de 40 horas durante la mayor parte de las semanas que trabajé para los demandados como conductor de camión. Nunca recibí ningún pago de horas extras cuando trabajé más de 40 horas en una semana. Se adjuntan a esta declaración copias de algunos de los

talones de cheque de pago que recibí cuando trabajé para los demandados que muestran que no recibí pago de horas extras cuando trabajé más de 40 horas en una semana.

6. Yo sé que mis compañeros de trabajo que vinieron de México con visas H-2A y también trabajaron como camioneros tampoco recibieron pago de horas extras. Lo sé porque vivíamos juntos y a veces hablábamos de cómo nos pagaban.

Declaro bajo pena de perjurio bajo las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto a mi leal saber y entender.

Ejecutado el 11 / 07 / 2025 de 2025



Felipe de Jesus Avila-Soto